

# EXHIBIT C

**JILL DILLARD vs CITY OF SPRINGDALE  
DILLARD, JILL on 09/01/2021**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE WESTERN DISTRICT OF ARKANSAS  
3                   FAYETTEVILLE DIVISION  
4                   JILL DILLARD, JESSA SEEWALD,  
5                   JINGER VUOLO, and JOY DUGGAR,  
6                   PLAINTIFFS,  
7                   VS.  
8                   CITY OF SPRINGDALE, ARKANSAS;  
9                   WASHINGTON COUNTY, ARKANSAS;  
10                  KATHY O'KELLEY, in her individual  
11                  and official capacities;  
12                  ERNEST CATE, in his individual  
13                  and official capacities; RICK  
14                  HOYT, in his individual and  
15                  official capacities; STEVE ZEGA,  
16                  in his official capacity;  
17                  BAUER PUBLISHING COMPANY, L.P.;  
18                  BAUER MAGAZINE, L.P.; BAUER MEDIA  
19                  GROUP, INC.; BAUER, INC.;  
20                  HEINRICH BAUER NORTH AMERICA,  
21                  INC.; BAUER MEDIA GROUP USA, LLC;  
22                  and DOES 1-10, inclusive  
23                  DEFENDANTS.  
24  
25

ORAL AND VIDEOTAPED DEPOSITION VIA VIDEOCONFERENCE OF  
JILL DILLARD  
SEPTEMBER 1, 2021

1 ORAL AND VIDEOTAPED DEPOSITION OF JILL DILLARD,  
2 produced as a witness at the instance of the  
3 Defendants, and duly sworn remotely was taken in the  
4 above-styled and numbered cause on the 1st day of  
5 September, 2021, from 10:04 to 5:47, before Dee Ann  
6 Adkins, CCR in and for the State of Arkansas, reported  
7 by machine shorthand, via video conference, pursuant  
8 to the Federal Rules of Civil Procedure.

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1 A. Yes, sir.

2 Q. Who would that have been?

3 A. Julia Mason and Chad Gallagher, I believe.

4 Q. Okay. Did they work together, or are they in  
5 separate offices or companies?

6 A. Separate.

7 Q. Where is Julia Mason based?

8 A. I believe in Nashville.

9 Q. And Chad Gallagher is there in Northwest  
10 Arkansas, right?

11 A. No, sir.

12 Q. He's in California?

13 A. No, sir.

14 Q. Where is located?

15 A. In Fouke, Arkansas, I think.

16 Q. Okay. How did y'all get -- end up hiring  
17 Julia Mason and Chad Gallagher as your agents? How  
18 did you come into contact with them?

19 A. We didn't really hire them at first.

20 Q. Okay. Who -- who did?

21 A. I'm confused. So, the two separate things.

22 Q. So I asked you how you came in contact with  
23 them, and you said you didn't hire them. How did you  
24 come into contact with them?

25 A. Yes, sir. So Chad Gallagher was like a friend

1 of my dad's, I guess, so my dad --

2 Q. Okay.

3 A. -- used him for stuff before we got married.

4 and then he was handling stuff, like, for my dad, and

5 I hadn't necessarily hired him for that.

6 Once Derek and I got married in 2014,

7 then is when he kind of transitioned into that role

8 for us, I guess. Like, and then at that point, I

9 don't remember, yeah, if we, like, officially hired

10 him or what. At what point that happened, I don't

11 know. And then Julia Mason was last year and, yeah,

12 it was different setups, yeah.

13 Q. Yeah. How did that work with Julia?

14 A. Derek was asking -- he asked somebody, a

15 friend, for a reference and got her contact

16 information that way.

17 Q. Okay. And what did y'all hire her to do?

18 A. Well, we didn't, like, technically hire her. It

19 was a contingent thing. So, like, if we'd gotten a

20 deal, then she would have represented us, I guess, and

21 made a portion of that. It was contingent.

22 Q. Yeah. Did she set up -- ultimately set up any

23 deals for you?

24 A. No, sir.

25 Q. Okay. Why was that? Why was -- from your

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DEFENDANTS.

CASE NO.  
5:17-5089-TLB

REPORTER'S CERTIFICATION

ORAL AND VIDEOTAPED DEPOSITION OF JILL DILLARD

AUGUST 31, 2021

I, Dee Ann Adkins, Certified Court Reporter in  
and for the State of Arkansas, hereby certifies the  
following:

That the witness, JILL DILLARD, was duly sworn  
remotely by me and that the transcript of the oral  
deposition is a true record of the testimony given by



1 the witness;

2 I further certify that pursuant to FRCP Rule  
3 30(e)(1) that the signature of the deponent was  
4 requested by the deponent or a party before the  
5 completion of the deposition and returned within 30  
6 days from date of receipt of the transcript.

7 If returned, the attached Changes and Signature  
8 Page contains any changes and the reasons therefor;

9 I further certify that I am neither attorney nor  
10 counsel for, related to, nor employed by any of the  
11 parties to the action in which this proceeding was  
12 taken.

13 Further, I am not a relative or employee of any  
14 attorney of record in this cause, nor do I have a  
15 financial interest in the action.

16 Subscribed and sworn to on this the 10th day  
17 of September, 2021.

18  
19 s/Dee Ann Adkins

20 Dee Ann Adkins, CCR, CSR

21 Certificate #477, State of Arkansas

22 Arkansas Realtime Reporting

23 1130 E. Millsap Rd

24 Fayetteville, AR 72703

25 479-301-2040



CHANGES AND SIGNATURE

PAGE	LINE	CHANGE	REASON
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19	15	DeQueen, Arkansas	Currently states "Fouke, Arkansas"
36	13	Jim Holt	Currently states "Jim Holts"
37	18	Query	Currently states "Cleary"
208	6	I was-I was awake...	Currently states "I was-- I wasn't awake"

I, JILL DILLARD, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

Jill Dillard  
JILL DILLARD

